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and for Defendants AEROFLEX INCORPORATED,
7 AMI SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
8 GRAPHICS, INC., MATROX INTERNATIONAL
CORP., MATROX TECH, INC., and
9 AEROFLEX COLORADO SPRINGS, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 RICOH COMPANY, LTD.,

14 Plaintiff,

15 vs.

16 AEROFLEX INCORPORATED, AMI
SEMICONDUCTOR, INC., MATROX
17 ELECTRONIC SYSTEMS LTD., MATROX
GRAPHICS INC., MATROX INTERNATIONAL
18 CORP., MATROX TECH, INC., AND
AEROFLEX COLORADO SPRINGS, INC.

19 Defendants.

Case No. C03-04669 MJJ (EMC)

**DECLARATION OF DENISE M. DE MORY
IN SUPPORT OF ADMINISTRATIVE
MOTION FOR AN ORDER PLACING
DOCUMENTS UNDER SEAL
(Civil L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

1 I, Denise M. De Mory declare as follows:

2 1. I am a partner at the law firm of Howrey LLP, counsel of record for Synopsys, Inc.
3 (“Synopsys”) and Aeroflex Incorporated, Aeroflex Colorado Springs, AMI Semiconductor, Inc., Matrox
4 Electronic Systems, Ltd., Matrox Graphics Inc., Matrox International Corp., and Matrox Tech, Inc. (“the
5 Customer Defendants”) in the above-captioned actions. I am a member in good standing of the State Bar of
6 California and have been admitted to practice before this Court. I have personal knowledge of the facts set
7 forth in this Declaration and, if called as a witness, could and would testify competently to such facts under
8 oath.

9 2. The Customer Defendants have lodged Exhibit Nos. 1-26 and 28-29 (“Fink Exhibits”) of
10 the Declaration of Jaclyn C. Fink in Support of Defendants; Memorandum of Points and Authorities in
11 Opposition to Ricoh’s Motion for Summary Judgment on Defendants’ Affirmative Defense of
12 Authorization and Consent with the clerk pursuant to Civil Local Rule 79-5. The lodged Fink Exhibits
13 were generated by Customer Defendant Aeroflex Incorporated/Aeroflex Colorado Springs (“Aeroflex”).
14 and were designated confidential pursuant to the protective order entered in this case.

15 3. The lodged Fink Exhibits contain nonpublic Aeroflex and third-party business information
16 such as sales information, license agreements and government contracts. This information is not publicly
17 known and could cause Aeroflex competitive harm were it to become publicly known.

18 4. Further, the lodged Fink Exhibits contain nonpublic Customer Defendant business
19 information such as product and sales information. This information is not publicly known and could cause
20 the Customer Defendants competitive harm were it to become publicly known.

21 5. Thus, the Customer Defendants believe that the lodged Fink Exhibits are properly
22 designated under the protective order entered in this case, and requests that the Court order the lodged Fink
23 Exhibits to be filed under seal.

24 I declare under penalty of perjury under the laws of the United States of America that the foregoing
25 is true and correct.

26 This declaration was executed at San Francisco, California on September 1, 2006

27
28 /s/Denise M. De Mory
Denise M. De Mory